



CITY OF CULVER CITY

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February 17, 2017

Elizabeth Scheehle
Branch Chief, Oil and Gas and GHG Mitigation Branch
California Air Resources Board
1001 "I" Street
Sacramento, CA, 95814

Subject: Revised Draft Regulation for Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities

Dear Ms. Scheehle:

The City of Culver City supports reasonable environmental regulations aimed at enhancing air quality. We seek to improve air quality in Culver City and the surrounding areas, and we want to ensure that air quality and public health are protected during oil and gas drilling. As such, the City of Culver City strongly supports the proposed rule to regulate greenhouse gas emissions from oil and gas facilities in California. We would like to thank the California Air Resources Board staff for being a national leader in promoting clean air. We especially value the provisions that:

- Require a quarterly baseline inspection requirement (without a step-down).
- Specify the use of continuous ambient air quality monitoring along the fencelines of natural gas storage facilities.
- Prioritize natural gas capture over combustion requirements.

These policies will result in the detection of more leaks, better maintenance, cleaner air, and improved public health.

We urge you to hasten the timeframe for adopting and implementing the rule. In this draft, implementation is delayed at least a year from when it was initially proposed. Clean air cannot wait. We also urge you to create a detailed plan for the CARB and local air pollution districts to implement the new regulations, including periodic audits of newly regulated facilities. With these improvements, CARB will ensure California remains a world leader in the protection of clean air and the reduction of greenhouse gas emissions.

If you have any questions, or wish to discuss this further, please contact Jesse Mays, Assistant to the City Manager, at (310) 253-6009.

Sincerely,



Jim B. Clarke
Mayor

cc: The Honorable Members of the City Council
John M. Nachbar, City Manager